



POLICE DEPARTMENT

April 6, 2010

MEMORANDUM FOR: Police Commissioner

Re: Police Officer Jose Valentin
Tax Registry 900694
32 Precinct
Disciplinary Case No. 83165/07

The above-named member of the Department appeared before the Court on November 9 and December 22, 2009, charged with the following:

1. Said Police Officer Jose Valentin, assigned to the 13 Precinct, while on duty, on or about September 9, 2006, in New York County, did engage in conduct prejudicial to the good order, efficiency or discipline of the Department, in that said police officer did commit a criminal failure of a targeted integrity test, in that said police officer accepted a wallet containing ninety-seven dollars from an officer posing as a livery cab driver, and where said police officer did fail to voucher said property.

P.G. 203-10, Page 1, Paragraph 5 – GENERAL REGULATIONS

P.G. 218-36, Page 1, Paragraph 1 – PROCESSING NON-EVIDENCE
CURRENCY

2. Said Police Officer Jose Valentin, assigned to the 13 Precinct, while on duty, on or about September 9, 2006, in New York County, did fail to enter into his Activity Log the circumstances and description of property taken into custody, as required. (*As amended*)

P.G. 218-01, Page 1, Paragraph 1 – INVOICING PROPERTY

P.G. 218-36, Page 1, Paragraph 2 – PROCESSING NON-EVIDENCE
CURRENCY

3. Said Police Officer Jose Valentin, assigned to the 13 Precinct, while on duty, on or about September 9, 2006, in New York County, having come into possession of found property, did fail to complete an Accident Information Exchange/
Acknowledgement of Found Property (PD 301-092), as required. (*As amended*)

P.G. 218-26, Page 1, Paragraph 1 – PROCESSING FOUND PROPERTY

4. Said Police Officer Jose Valentin, assigned to the 13 Precinct, while on duty, on or about September 9, 2006, in New York County, did engage in conduct prejudicial to the good order, efficiency or discipline of the Department, in that said police officer did wrongfully impede an official Department investigation, in that said police officer did provide incomplete information during an Official Department Interview, to wit: said police officer did fail to record and was unable to identify the party to whom said police officer did turn found property over to, requiring investigators to conduct additional investigation. (*As amended*)

P.G. 203-10, Page 1, Paragraph 5 – GENERAL REGULATIONS

The Department was represented by Lisa McFadden, Esq., Department Advocate's Office, and the Respondent was represented by Michael Martinez, Esq.

The Respondent, through his counsel, entered a plea of Not Guilty to the subject charges. A stenographic transcript of the trial record has been prepared and is available for the Police Commissioner's review.

DECISION

The Respondent is found Guilty of Specification Nos. 1, 2 and 3. Specification No. 4 is dismissed.

SUMMARY OF EVIDENCE PRESENTED

The Department's Case

The Department called Captain Gerard Dowling, Retired Detective Dennis Critton, and Police Officer Alejandro Sandoval as witnesses.

Captain Gerard Dowling

Dowling, a 14-and-a-half-year member of the Department, is currently assigned to Narcotics Borough Manhattan South. On September 9, 2006, while assigned to the Internal Affairs Bureau (IAB), he supervised a targeted integrity test of the Respondent. The test involved undercover Detective Dennis Critton giving the Respondent a wallet with \$97.00 in cash inside.

Dowling's team found the Respondent that day at the scene of a robbery in progress on 18 Street and Fifth Avenue. The Respondent was assigned to secure the crime scene. Critton, pretending to be a livery cab driver, gave the Respondent the wallet. The test took place at approximately 9:30 a.m. By the time Dowling got to the location, the integrity test had already been completed. Dowling saw the Respondent on foot with the wallet in his hand. The Respondent was not followed by IAB once the test was over. At the time of the test, the Respondent was assigned to the 13 Precinct, and he was partnered with Police Officer Alejandro Sandoval.

Later that day, Dowling went to the 13 Precinct station house to examine the Command Log, Property Index, and Property Log. Dowling determined that the property had not been vouchered by the Respondent. The Respondent was scheduled to end his tour at 3:40 p.m. that day. At approximately 4:00 p.m., Dowling observed the Respondent in his personal vehicle and followed him for 20 minutes before losing him in traffic. At no point did Dowling observe the Respondent stop or get out of the car. Dowling then went to the Respondent's residence to conduct surveillance. The Respondent's car was not there.

Dowling testified that the Patrol Guide dictates that when a police officer comes into possession of found property, the officer is supposed to contact the patrol supervisor, make an Activity Log entry, issue an Accident Information Exchange/Acknowledgement of Found Property form, and issue a receipt to the person who turned in the property. Dowling continued that if the property is turned in by a yellow medallion cab driver in Patrol Borough Manhattan South, the officer can ask the driver to take the property to the 17 Precinct. This special procedure does not apply to livery cabs. The wallet given to the Respondent should, therefore, have been vouchered in the 13 Precinct. Dowling further continued that when an officer receives currency, he is supposed to go the station house and get a voucher from the desk officer. After the officer types up the voucher, the desk officer documents the property with entries in the Command Log, Property Index, and Property Log. The police officer then takes the currency to a Chase Manhattan bank, where a bank drop-off is performed. If the officer who invoiced the currency is at the end of his tour, another officer may go to the bank in his place. According to Dowling, there was no record of \$97.00 being deposited on the day of the test. Dowling stated that the entire vouchering process can take 45 minutes to an hour. If at any point the officer who received the property cannot finish the process, he should notify a supervisor and record in his Activity Log the name of the member of the service who is assigned to take over responsibility for the property.

As part of his investigation, Dowling interviewed the Respondent about his failure to voucher the wallet. In the April 19, 2007 Official Department Interview, the Respondent stated that when he went to the 13 Precinct station house to voucher the wallet, he saw a police officer from the 17 Precinct. The Respondent asked the

17 Precinct officer to vouch for the wallet since it had been found in a cab. The Respondent vaguely described the 17 Precinct officer as a "young male white officer." Dowling explained that it would be feasible for an officer assigned to the 17 Precinct to be in the 13 Precinct station house because the 17 Precinct station house was undergoing construction at the time. Dowling spent over an hour showing the Respondent photographs of officers assigned to the 17 Precinct, but the Respondent was unable to identify anybody as the officer who took possession of the wallet. [Department's Exhibit (DX) 1 consists of copies of 108 photographs that Dowling showed the Respondent in an effort to identify the 17 Precinct officer who received the wallet.] Dowling subsequently reviewed the Command Log, Property Log, and Property Index from the 17 Precinct and other neighboring precincts, but he did not find any indication of \$97.00 being vouchered anywhere. According to Dowling, had the Respondent provided additional information about the officer to whom he turned over the wallet, it would have assisted in the investigation.

On cross-examination, Dowling testified that because of the construction at the 17 Precinct station house in September 2006, officers assigned to the 17 Precinct needed to process arrests in the 13 Precinct. It was during the April 2007 interview that Dowling heard for the first time about the Respondent giving the wallet to a 17 Precinct officer. At that point, Dowling got on a computer and printed off the photographs of all the male white officers assigned to the 17 Precinct. Dowling did not know if the photographs he showed the Respondent depicted officers who were working on the day that the integrity test was performed. Other than printing the photographs and showing them to the Respondent, nothing was done with respect to determining who received the wallet from

the Respondent. Dowling never questioned officers assigned to the 17 Precinct about receiving a wallet from the Respondent.

Dowling reiterated that when property is turned in by a yellow medallion cab driver in Patrol Borough Manhattan South, the officer can ask the driver to take the property to the 17 Precinct. He explained that this is because the 17 Precinct is a hub site for the Taxi and Limousine Commission (TLC). Although livery cabs fall under the TLC, the property procedure for yellow medallion cabs does not apply to livery cabs.

At the time of the integrity test, the Respondent was guarding the scene of a robbery at a Barnes and Noble store. Dowling agreed that the robbery was a big deal, and certain streets had been closed off to pedestrians. The Emergency Services Unit (ESU) had responded to the location. When Critton gave the Respondent the wallet, the Respondent was not standing with his partner. The Respondent was responsible for not letting pedestrians pass by. According to Dowling, it was not inappropriate for the Respondent to hold onto the wallet and wait until the crime scene was released before notifying the patrol supervisor about the wallet. Upon receiving the wallet, the Respondent gave Critton a piece of paper with his name and precinct on it.

[Respondent's Exhibit A is a photocopy of the piece of paper the Respondent gave Critton.] Critton, who approached the Respondent on foot, told the Respondent that he had found the wallet in his car. Dowling did not recall the Respondent asking Critton for his telephone number. Dowling spoke with the District Attorney's Office, and no criminal action was taken against the Respondent. The Respondent was not placed on modified duty status as a result of his conduct.

When asked why the Respondent was charged with impeding an investigation, Dowling replied, "Maybe his evasive statements during the [Official Department Interview], maybe that was part of the impeding. I don't know." Dowling stated that he does not consider the Respondent's failure to write down the name of the 17 Precinct officer to whom he gave the wallet to be part of the impeding charge. When the Respondent failed to write down that officer's name, he did not know that there was an integrity test going on.

On redirect examination, Dowling testified that although integrity tests are supposed to be recorded, the test conducted on the Respondent was not. Dowling explained that the team members assigned to record the test were at another location. He further explained that it is not uncommon for tests to go unrecorded due to exigent circumstances. Dowling stated that an officer should memorialize in his Activity Log the actions he takes each day. There was no indication that the Respondent ever told a supervisor that he obtained a wallet.

Upon being recalled by the Court, Dowling testified that he did not find to be credible the Respondent's claim that he (the Respondent) handed over the wallet to an officer assigned to the 17 Precinct. Dowling explained that because taking possession of money is such a serious responsibility, it is hard to believe that the Respondent would just hand it over to another officer that he did not know without taking that officer's name down. Dowling stated that the Respondent was not, however, charged with stealing the money, and there is a possibility that he did, in fact, hand over the property to another officer. Because the Respondent could not identify the officer to whom he gave the wallet, no officers at the 17 Precinct were interviewed about it. Dowling explained that

his supervisors did not think it would be feasible to conduct interviews of all the white males who were working at the 17 Precinct on the day of the test.

On recross-examination, Dowling testified that the first time it was ever mentioned to the Respondent that there was money missing was seven months after the integrity test at his Official Department Interview.

Retired Detective Dennis Critton

Critton retired from the Department in December 2008 after 17 years of service. On September 9, 2006, while assigned to IAB, he was the undercover in the integrity test conducted on the Respondent. Critton, pretending to be a livery cab driver, presented the Respondent with a wallet that contained \$97.00 in cash. Before the test, Critton photographed the money. [DX 2 is a copy of the photographed money.]

The car that Critton drove to the test location was a gray Lincoln. Critton found the Respondent working by himself, blocking off the street at the corner of Fifth Avenue and 17 Street. Critton parked the car and walked approximately five car lengths to the Respondent. According to Critton, he told the Respondent, "I [am] a livery cab driver, my cab is parked right over there. I picked up a male passenger and he left this wallet containing this money as he exited the vehicle. I would like you to do what you have to do with it." The Respondent asked Critton if there was identification in the wallet, and Critton replied that there was not. The Respondent took the wallet and asked Critton for the name and telephone number of the cab company. Critton provided the Respondent with that information, and the Respondent wrote it down on a piece of paper in his Activity Log. Critton then asked the Respondent for his name. The Respondent

proceeded to write his name on a piece of paper and give the paper to Critton. The Respondent did not give Critton any other paperwork. Critton then went back to the car and departed the location. At no point during the test did the Respondent tell Critton that he could not take the wallet into custody or that Critton needed to bring the property to the 17 Precinct.

Later that day, Critton along with other members of his team reviewed the 13 Precinct logs to see if the wallet and money had been entered as found property. There was no record of the property at the 13 Precinct. On September 12, 2006, the team reviewed the logs of neighboring precincts (6 Precinct, 10 Precinct, 17 Precinct, Midtown South, and Transit District 2). The team found no indication of the wallet and money being vouchered anywhere.

The integrity test conducted on the Respondent was recorded on a concealed tape recorder. Critton testified that in addition to the test, it is possible to hear on the tape the Respondent talking to members of the public who were trying to walk by. In addition, a lot of people were asking the Respondent what was going on. Critton explained there is also background noise on the tape, as the area was pretty crowded and there was a lot going on. [DX 3 and 3A are the tape and transcript of the integrity test.]

At one point during the investigation, the Respondent told Critton that he informed Sandoval, his partner on the day of the test, that he had recovered money and was going to give it to an unidentified officer in the 17 Precinct. Upon review of the Respondent's Activity Log, Critton found no entry regarding the receipt of the wallet, vouchering the wallet, or turning over the wallet to another officer. [DX 4 is a copy of the Respondent's Activity Log from the day of the test.]

On cross-examination, Critton testified that the Respondent was pretty busy on the day of the test. Critton stated that there were things said during the interaction between him and the Respondent that did not show up on the transcript of the integrity test. Critton could not recall every single thing that he and the Respondent said during the course of the test. To make it clear that he was a cab driver, Critton pointed to the cab and mentioned to the Respondent that he had a passenger. In addition to the name and telephone number of the cab company, the Respondent asked Critton for the number of his car. The Respondent also asked Critton where he dropped off the passenger who had left the wallet in the car.

On redirect examination, Critton testified that portions of the integrity test were not picked up on tape because the area was very congested and there was a lot of background noise. When Critton reviewed the Respondent's Activity Log, he did not find any record of the cab company name or number.

Police Officer Alejandro Sandoval

Sandoval, a five-year member of the Department currently assigned to the Youth Services Section, used to work in the 13 Precinct. During the two years that he worked in the precinct, he occasionally partnered with the Respondent. At 7:59 a.m. on September 9, 2006, while on patrol with the Respondent, they received a job of a robbery in progress at Barnes and Noble. Upon their arrival at the store, they learned that there were hostages being held in the basement. They, therefore, notified a supervisor and ESU. When the duty captain arrived, he instructed Sandoval to guard one of the store exits. The Respondent was given another assignment, and Sandoval did not remain in visual contact

with him. At 10:37 a.m., Sandoval and the Respondent were released from Barnes and Noble, and a minute later they picked up another job. At 10:55 a.m., they picked up yet another job and then went to meal at 12:18 p.m. After meal, they had jobs at 1:39 p.m., 2:27 p.m., 2:49 p.m., and 3:00 p.m. These jobs included a dispute, a burglar alarm, and harassment. There was no indication in Sandoval's Activity Log that they went to the 13 Precinct station house or any other precinct during their tour that day. Sandoval testified that he did not recall the Respondent ever telling him about taking possession of a wallet or money. Sandoval was interviewed about that day approximately a year and a half ago. Even at that time, he had no recollection of the Respondent telling him about a wallet or money.

On cross-examination, Sandoval testified that he and the Respondent were busy responding to jobs on September 9, 2006. He stated that what stands out in his mind most about that day was the robbery at Barnes and Noble. He conceded that it is possible that the Respondent told him something about being given a wallet to voucher, but he (Sandoval) just does not recall it.

The Respondent's Case

The Respondent testified in his own behalf.

Respondent Police Officer Jose Valentin

The Respondent, an 18-year member of the Department, is currently assigned to the 32 Precinct. He testified that while assigned to the 13 Precinct on September 9, 2006, he responded to a robbery in progress at a Barnes and Noble store located at 18 Street and

Fifth Avenue. Many other units responded to the store, including ESU and the duty captain. The duty captain instructed the Respondent to stand at Fifth Avenue and 17 Street and prevent pedestrians from walking north on 17 Street. People on the street asked the Respondent what was going on and if they could pass by. Sandoval, the Respondent's partner that day, was assigned to stand up the block near a store exit.

At one point, a man that the Respondent believed to be a livery cab driver (previously identified as Critton) told the Respondent that a passenger had left a wallet in his cab. The Respondent told Critton to bring the wallet to the 17 Precinct. The Respondent explained that all property found in taxis in Patrol Borough Manhattan South goes to the 17 Precinct because "they do the [TLC] stuff there." He stated that this has been Department policy since the time he graduated from the Police Academy. Critton told the Respondent that he did not have time to take the wallet to the 17 Precinct. The Respondent, therefore, took possession of the wallet. In exchange, he gave Critton a piece of paper with his name and precinct written on it. The Respondent also wrote on another piece of paper Critton's license plate number and the name of the cab company. The Respondent stuck this piece of paper inside the wallet. The Respondent testified that he did not have an Accident Information Exchange/Acknowledgement of Found Property form on him at the time. When he was finished exchanging information with Critton, the Respondent placed the wallet inside a bag in the back of his Department vehicle. It was his intention at the time to voucher the wallet when he returned to the 13 Precinct station house.

The Respondent testified that at several times during his exchange with Critton, he had to address members of the public who had questions or wanted to walk through

the scene. The Respondent considered it a priority to not let anyone pass by him. He was at the Barnes and Noble for over two and a half hours.

When the Respondent went to the 13 Precinct station house later in the day to voucher the wallet, he saw a young officer assigned to the 17 Precinct. He asked this officer to do him the favor of vouchering the wallet since TLC property is processed in the 17 Precinct. The Respondent described the officer as a white male, approximately 5'9" tall, with dark hair. The Respondent had never seen the officer before, has not seen him since, and does not recall the officer's name. At the time, the 17 Precinct station house was under construction, and officers assigned to the 17 Precinct were using the 13 Precinct station house for processing their arrests.

Approximately seven months later, at an April 19, 2009 Official Department Interview, the Respondent learned for the first time that there was a problem regarding the vouchering of the wallet. After the Respondent told investigators that he handed the wallet over to an officer assigned to the 17 Precinct, the investigators showed him a photo array. Although he looked at each photograph carefully, the Respondent was unable to identify the officer to whom he had given the wallet. He explained that his interaction with the officer was limited to noticing 17 Precinct collar brass and asking him to voucher the wallet.

The Respondent conceded that he did not properly voucher the property. He testified that he learned from this experience not to put his trust in another officer. In the future he will voucher himself property that he receives. The Respondent also conceded that he did not record his acceptance of the property in his Activity Log. He explained that he did not memorialize it in his Activity Log because he was busy at the time

securing the crime scene from pedestrian traffic. Because the Respondent did not have an Accident Information Exchange/Acknowledgement of Found Property form on him, he could have called a fellow officer to supply him with one.

The Respondent testified that he had no idea on September 9, 2006 that he was the subject of an integrity test. He further testified that he would have helped the investigators locate the 17 Precinct officer had he been able to identify him. This experience has taught him how important it is to cover himself and prepare the proper paperwork.

On cross-examination, the Respondent testified that at the time of the incident he had been a police officer for approximately 14 years. The September 2006 integrity test was the first time that he was handed found property while out on patrol. He had, however, previously vouchered property (including money and drugs) taken from prisoners. He knows the importance of properly vouchering things of value. At no point did the Respondent open the wallet to see how much money was inside.

The Respondent stated that he is now aware that his understanding of the policy regarding property found in livery cabs was incorrect. In actuality, property from livery cabs should be vouchered in whichever precinct the property is found. The Respondent responded to several jobs and went to meal in between the time that he left the Barnes and Noble and the time that he returned to the station house. At no point during that period did he enter his acceptance of the wallet in his Activity Log because he had forgotten about it. At no point did he inform a patrol supervisor that he had come into possession of a wallet with money in it. Although the Respondent made fairly detailed entries in his Activity Log for the jobs he handled that day, he did not record his return to

the station house or his handing over of the wallet to another officer. The Respondent stated that it is his standard practice to document in his Activity Log when he turns over property to another officer, but he failed to do so in this particular case. He clarified that the wallet could have been vouchered in the 13 Precinct, but he thought it would be easier to voucher in the 17 Precinct since it was found in a cab.

FINDING AND ANALYSIS

Specification Nos. 1, 2, and 3

The Respondent has been charged with failing to voucher a wallet containing \$97.00 in cash. The wallet was given to the Respondent by an undercover detective pretending to be a livery cab driver in an integrity test. The Respondent has also been charged with failing to enter into his Activity Log the circumstances and description of the property taken into custody and failing to complete an Accident Information Exchange/Acknowledgement of Found Property form.

The Respondent has admitted to committing the alleged misconduct. He testified that instead of vouchering the wallet, he gave the property to a police officer assigned to the 17 Precinct. He explained that he thought it would be easier for the wallet to be vouchered at the 17 Precinct because he was under the mistaken belief that property from livery cabs should be vouchered at the TLC hub located in that command. The Respondent also explained that he did not record his acceptance of the property in his Activity Log because he was busy at the time securing a crime scene from pedestrian traffic. While the integrity test was taking place, the Respondent was safeguarding a Barnes and Noble store where robbers were holding hostages in the basement.

On the tape recording of the test, the Respondent can be heard talking to members of the public as they tried to walk by or ask questions about the situation. The Respondent was clearly in the midst of a serious police incident. According to the Respondent, he did not make an Activity Log entry later in the day because he forgot about it. As for his failure to prepare an Accident Information Exchange/Acknowledgement of Found Property form, the Respondent conceded that he did not have any of these forms on him but could have called over a fellow officer to supply him with one. Instead of doing this, he gave Critton a piece of paper with his name and precinct written on it.

Based on the foregoing, the Respondent is found Guilty of these Specifications.

Specification No. 4

The Respondent has been charged with engaging in conduct prejudicial to the good order, efficiency or discipline of the Department, in that he wrongfully impeded an official Department investigation, in that he provided incomplete information during an Official Department Interview, to wit: he failed to record and was unable to identify the party to whom he turned over found property, requiring investigators to conduct additional investigation.

It was at his Official Department Interview that the Respondent learned there was an investigation into his handling of the property. The interview took place approximately seven months after the integrity test. When he told the investigators that he did not know the name of the 17 Precinct officer to whom he handed over the wallet, the investigators showed him photographs of all the male white police officers assigned to the 17 Precinct. The Respondent was unable to identify any of the officers in the photo array.

The Court finds this Specification confusing on its face. The fact that the date in the specification is September 9, 2006 (the date of the integrity test) and the mention of the Respondent's failure to record the officer to whom he turned over the property suggests that this charge stems from his failure to document the name of the 17 Precinct officer in his Activity Log. At the same time, the reference to the Respondent providing incomplete information at his Official Department Interview and the mention of his inability to identify the 17 Precinct officer suggests that this charge is really about the answers the Respondent gave to investigators on April 19, 2007. In either scenario, the Court finds that charging the Respondent with "impeding an investigation" to be inappropriate.

Impeding an investigation typically involves an act or statement intended to throw an investigation off its course. The Respondent has been charged and found guilty of failing to make proper Activity Log entries. This failure, however, does not automatically constitute the impeding of an investigation and to suggest otherwise would be dangerous precedent to create. To do so would allow every omission of memo book entries to be subject to allegations in this forum and possibly other forums to impeding an investigation.

The same is true of the Respondent's inability to recall at the time of his interview the identity of a person with whom he had minimal contact months earlier. Had IAB investigators questioned the Respondent sooner, they may well have gotten useful answers from him. Instead, IAB waited seven months to bring him in for questioning. The fact that he could not recall certain information at that point should not be grounds

for charging him with impeding an investigation and the failure to make notations in his Activity Log is covered in Specification No. 2.¹

Based on the forgoing, this Specification is dismissed.

PENALTY

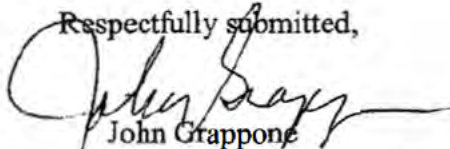
In order to determine an appropriate penalty, the Respondent's service record was examined. See Matter of Pell v. Board of Education, 34 N.Y.2d 222, 240 (1974). The Respondent was appointed to the Department on January 13, 1992. Information from his personnel folder that was considered in making this penalty recommendation is contained in the attached confidential memorandum.

The Respondent has been found Guilty of failing to voucher a wallet containing \$97.00 that was given to him during an integrity test, failing to make Activity Log entries about the property, and failing to complete an Accident Information Exchange/Acknowledgement of Found Property form. In neglecting to process and voucher the wallet containing the \$97.00 and by failing to make common sense notations in his Activity Log, or document the transfer of the wallet in any way, he made it impossible to locate the wallet.

¹ This would obviously be a different case if the Department had somehow been able to show that the Respondent did, in fact, know the identity of the 17 Precinct officer but pretended to forget for the purpose of sabotaging the investigation.

Based on the foregoing, it is recommended that the Respondent forfeit a penalty of 30 vacation days.

Respectfully submitted,



John Grappone

Assistant Deputy Commissioner Trials

APPROVED



AUG 04 2010

RAYMOND W. KELLY
POLICE COMMISSIONER

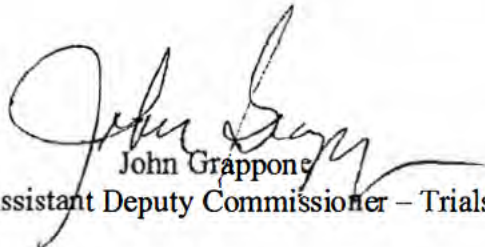
POLICE DEPARTMENT
CITY OF NEW YORK

From: Assistant Deputy Commissioner – Trials
To: Police Commissioner
Subject: CONFIDENTIAL MEMORANDUM
POLICE OFFICER JOSE VALENTIN
TAX REGISTRY NO. 900694
DISCIPLINARY CASE NO. 83165/07

The Respondent received an overall rating of 4.0 “Highly Competent” on his last three annual performance evaluations. [REDACTED]

[REDACTED] Based on his overall record, the Respondent was placed on Level-II Discipline Monitoring in February 2008. He has no prior formal disciplinary record.

For your consideration.


John Grappone
Assistant Deputy Commissioner – Trials